

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

CLERK OF DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL TIMOTHY WHITE,
DURELL RICHESON,
DALLAS DELATTE, aka DAL,
AMANDA BALL,

Defendants.

INDICTMENT

JUDGE LIOI

5:22 CR 83

CASE NO.

Title 18, United States Code,
Sections 1028A(a)(1), 1349, and
2; Title 21, United States Code,
Sections 841(a)(1), (b)(1)(C),
(b)(3), and 846

General Allegations

1. Promethazine is a drug commonly used to treat coughs. Promethazine is not a federally-controlled substance, but is classified as a dangerous drug by the State of Ohio and therefore requires a prescription to dispense or obtain under Ohio law. Codeine is an opioid pain reliever. Codeine can be prescribed to treat coughs. Codeine is a Schedule V controlled substance under federal law, and therefore required a prescription for an individual to dispense or obtain. Prescription cough syrup often contains a mixture of promethazine and/or codeine.

2. In addition to legitimate medical uses, prescription cough syrup with promethazine and/or codeine can be used as an illicit recreational drug. In that form, it is commonly mixed with a soft drink and/or a hard candy, and is referred to as by street names like *purple drink*, *drink*, *drank*, *purple drank*, or *lean*.

3. A DEA number was a unique identifier assigned by the U.S. Drug Enforcement Administration ("DEA") to an individual health care provider, such as a physician or a

physician's assistant. A health care provider sometimes included their DEA number when issuing a prescription. A provider's DEA number was a "means of identification" within the meaning of 18 U.S.C. §§ 1028(d)(7) and 1028A(a)(1).

4. A National Provider Identifier ("NPI") was a unique 10-digit number issued to individual health care providers by the Centers for Medicare and Medicaid Services, a federal agency within Department of Health and Human Services. A provider's unique NPI was sometimes used in place of their DEA number when issuing a prescription. A provider's NPI was a "means of identification" within the meaning of 18 U.S.C. §§ 1028(d)(7) and 1028A(a)(1).

COUNT 1

(Conspiracy to Commit Wire Fraud, 18 U.S.C. § 1349)

The Grand Jury charges:

5. The factual allegations of Paragraphs 1–4 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

6. From in or around March 2019 to in or around December 2020, in the Northern District of Ohio, Eastern Division and elsewhere, Defendants MICHAEL TIMOTHY WHITE, DURELL RICHERSON, DALLAS DELATTE, aka DAL, and others known and unknown to the Grand Jury, did knowingly and intentionally combine, conspire, confederate, and agree with each other, and with others known and unknown to the Grand Jury, to devise and intend to devise a scheme and artifice to defraud and to obtain money and property by means of materially false and fraudulent pretenses, representations and promises, and for the purpose of executing such scheme and artifice, and attempting to do so, transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, writings, signals, signs, pictures and sounds, in violation of Title 18, United States Code, Section 1343 (Wire Fraud).

Object of the Conspiracy

7. The object of the conspiracy was to obtain controlled substances, including promethazine-codeine cough syrup, from pharmacies through fraudulent means by presenting falsified prescriptions, and then re-distributing the controlled substances to others.

Manner and Means

8. It was part of the conspiracy that:

A. Conspirators maintained a Google email account in the name of *jamesbing2019@gmail.com* for the purpose of storing falsified prescriptions on a cloud server, which could then be accessed remotely by other conspirators.

B. Conspirators caused interstate wires to be transmitted in accessing and utilizing the *jamesbing2019* Google account.

C. Conspirators caused the forged prescriptions to be printed onto security paper. Conspirators then attempted to pass the prescriptions at pharmacies located in the Northern District of Ohio and elsewhere.

D. Conspirators made small edits to the forged prescriptions before attempting to pass the prescriptions at pharmacies, such as changing the patient's name or changing a digit in a provider's NPI number.

E. Conspirators used the DEA and NPI numbers of real people, without their knowledge, to obtain prescriptions.

Acts in Furtherance of the Conspiracy

9. In furtherance of the conspiracy and to achieve its objectives, MICHAEL TIMOTHY WHITE, DURELL RICHESON, DALLAS DELATTE, and others committed the following acts in furtherance, among others, in the Northern District of Ohio and elsewhere:

10. On or about March 19, 2019, DALLAS DELATTE possessed a forged prescription [DEA EX N-26] for promethazine bearing the name and NPI of J.P., a healthcare provider in Akron, Ohio. The forged prescription was purportedly for a patient named J.P. (who had the same initials as the healthcare provider, but a different name).

11. On or about July 2, 2019, DALLAS DELATTE possessed a forged prescription (DEA EX N-18) for promethazine-codeine bearing the name, DEA number, and NPI of D.O., a healthcare provider in Akron, Ohio. The forged prescription was purportedly for a patient named R.W.

12. On or about September 5, 2019, DURELL RICHERSON had a phone conversation with another person. During the conversation, the person asked RICHERSON for some “drink” [cough syrup with promethazine/codeine]. RICHERSON said, “hold on, I’ll Facetime you.”

13. On or about September 5, 2019, RICHERSON and the person had another phone conversation. During that conversation, RICHERSON said he could get the “green stuff” [prescription cough syrup], but it was just promethazine without the codeine. RICHERSON further stated that the promethazine with codeine was hard to get, and that it was going for \$100 per ounce.

14. Between approximately November 13, 2019 and November 20, 2019, MICHAEL TIMOTHY WHITE had a text message conversation with N.C., a person known to the Grand Jury. WHITE texted, “Wen I get home meet at dal [DALLAS DELATTE] . . . Hawkins [Street in Akron, Ohio] . . . To why up cuzzo . . . The laptop at Dal house.” N.C. replied, “Dude u wont answer nw u gtta cum 2 me i didn’t knw whr u were or knew whr 2 cum but I kp telln u I nd 2 c u 911 tho.” WHITE then replied, “Was in the middle of moving this shit to this office cuzzo and

I cant come out there . . . Dal bout to tap in on the pages [meaning access the *JamesBing2019* account].”

15. On or about January 29, 2020, DURELL RICHERSON possessed a forged prescription [DEA EX N-20-1] for hydrocodone polistirex and chlorpheniramine polistirex [narcotic cough syrups] bearing the name, NPI, and DEA number of D.P., a healthcare provider in Ohio. The forged prescription was purportedly for a patient named J.S.

16. On or about January 29, 2020, DURELL RICHERSON possessed a forged prescription [DEA EX N-20-2] for promethazine-codeine bearing the name, NPI, and DEA number of D.P., a healthcare provider in Ohio. The forged prescription was purportedly for a patient named J.S.

17. On or about February 4, 2020, DURELL RICHERSON and DALLAS DELATTE possessed two digital scales, a stainless steel pill press, and an embosser machine at XXX South Hawkins St., Akron, Ohio. DELATTE also possessed a Taurus .40 caliber pistol, and a quantity of fentanyl.

18. On or about February 7, 2020, DURELL RICHERSON possessed a forged prescription [DEA EX N-21] for promethazine-codeine bearing the name and DEA number of C.P., a healthcare provider in the Northern District of Ohio. The forged prescription also bore a NPI that was one digit different from C.P.'s actual NPI. The forged prescription was purportedly for a patient named M.J.

19. On or about February 10, 2020, DURELL RICHERSON possessed a forged prescription [DEA EX N-22] for promethazine-codeine bearing the name, NPI, and DEA number of C.P., a healthcare provider in the Northern District of Ohio. The forged prescription was purportedly for a patient named M.S.

20. On or about February 10, 2020, DURELL RICHERSON possessed a forged prescription [DEA EX N-25] for promethazine-codeine bearing the name, NPI, and DEA number of C.P., a healthcare provider in the Northern District of Ohio. The forged prescription was purportedly for a patient named D.J.

21. On or about February 10, 2020, DALLAS DELATTE possessed a forged prescription [DEA EX N-23] for promethazine bearing the name and NPI of D.I., a healthcare provider in Akron, Ohio. The forged prescription was purportedly for a patient named G.E.

22. On or about February 11, 2020, DURELL RICHERSON possessed a forged prescription [DEA EX N-16] for hydrocodone polistirex and chlorpheniramine polistirex [narcotic cough syrups] bearing the name and DEA number of C.P., a healthcare provider in the Northern District of Ohio. The forged prescription also bore a NPI that was one digit different from C.P.'s actual NPI. The forged prescription was purportedly for a patient named G.S.

23. On or about February 12, 2020, DURELL RICHERSON possessed a forged prescriptions [DEA EX N-19-1] for metronidazole [an antibiotic] bearing the name and NPI of C.P., a healthcare provider in the Northern District of Ohio. The forged prescription was purportedly for a patient named D.J.

24. On or about February 12, 2020, DURELL RICHERSON possessed a forged prescriptions [DEA EX N-19-2] for promethazine-codeine bearing the name and NPI of C.P., a healthcare provider in the Northern District of Ohio. The forged prescription was purportedly for a patient named D.J.

25. On or about February 14, 2020, DURELL RICHERSON possessed a forged prescription [DEA EX N-17] for hydrocodone polistirex and chlorpheniramine polistirex

[narcotic cough syrups] bearing the name, DEA number, and NPI of D.P., a healthcare provider in Ohio. The forged prescription was purportedly for a patient named T.J.

26. On or about April 20, 2020, MICHAEL TIMOTHY WHITE possessed a cell phone that was accessing the *jamesbing2019@gmail* account.

27. On or about December 15, 2020, MICHAEL TIMOTHY WHITE possessed identification documents bearing a similar name to the *jamesbing2019* Google account, and security paper that matched the type of paper used for the forged prescriptions stored on the *jamesbing2019* Google account, at a location at XXXX Bedford Avenue, SW, Canton, Ohio.

28. On or about the dates listed below, MICHAEL TIMOTHY WHITE, DURELL RICHESON, DALLAS DELLATE, and others, transmitted and caused to be transmitted by means of wire communications in interstate and foreign commerce, the following matters, each constituting a separate act in furtherance:

	Date and Time of Access	IP Address that Accessed the <i>jamesbing2019</i> Google account	IP Address Location
a	01-11-2020 23:12:51 UTC	2602:30a:2c83:9870:35dc:eed2:b2b6:76cb	Akron, OH
b	01-10-2020 07:54:31 UTC	2602:30a:2c83:9870:d0f2:153e:2f6b:617d	Akron, OH
c	01-09-2020 04:24:00 UTC	2602:30a:2c83:9870:c9b7:4cda:1e06:2d63	Akron, OH
d	01-05-2020 20:09:59 UTC	2602:30a:2c83:9870:fc53:8b8b:becc:7f3d	Akron, OH
e	12-28-2019 06:33:25 UTC	2602:30a:2c83:9870:f43c:2be1:a1f5:4580	Akron, OH
f	12-19-2019 20:20:38 UTC	2602:30a:2c83:9870:a131:ad1d:facc:7409	Akron, OH
g	12-19-2019 20:20:34 UTC	2602:30a:2c83:9870:a131:ad1d:facc:7409	Akron, OH
h	12-14-2019 23:21:59 UTC	2602:30a:2c83:9870:85f7:192c:34fb:d058	Akron, OH
i	12-13-2010 23:02:27 UTC	2602:30a:2c83:9870:c8f1:2e8c:6e29:96cb	Akron, OH
j	12-10-2019 00:01:04 UTC	2602:30a:2c83:9870:18ff:4e6c:b2bc:f680	Akron, OH

	Date and Time of Access	IP Address that Accessed the <i>jamesbing2019</i> Google account	IP Address Location
k	11-18-2019 19:49:53 UTC	99.157.226.48	Akron, OH
l	11-18-2019 19:46:22 UTC	99.157.226.48	Akron, OH
m	11-12-2019 16:00:22 UTC	2602:30a:2c83:9870:98a6:5589:5fa1:85f8	Akron, OH
n	10-21-2016 14:25:19 UTC	2602:30a:2c83:9870:843d:79f7:74fa:7d58	Akron, OH
o	10-09-2019 09:10:25 UTC	162.200.57.135	Akron, OH
p	10-08-2019 04:35:56 UTC	2602:30a:2c83:9870:c5c9:b3d6:d883:f68e	Akron, OH
q	10-08-2019 04:28:02 UTC	2602:30a:2c83:9870:c5c9:b3d6:d883:f68e	Akron, OH
r	09-19-2019 17:25:54 UTC	2602:30a:2c83:9870:944d:4d1b:1ca2:3f63	Akron, OH
s	09-14-2019 00:56:04 UTC	2602:30a:2c83:9870:6d53:7aad:8cb0:5fed	Akron, OH
t	09-11-2019 22:38:11 UTC	2602:30a:2c83:9870:40c2:3b99:f0bd:c9	Akron, OH
u	08-22-2019 03:55:58 UTC	2602:30a:2c83:9870:d515:dcc8:7b09:4fc6	Akron, OH
v	08-15-2019 20:23:49 UTC	2602:30a:2c83:9870:a42e:a5ac:3566:e07c	Akron, OH
w	07-25-2019 15:25:29 UTC	2602:30a:2c83:9870:b10f:12f3:9144:76a2	Akron, OH
x	07-25-2019 09:59:54 UTC	2602:30a:2c83:9870:259c:c94f:d702:9445	Akron, OH
y	06-29-2019 08:25:20 UTC	2602:30a:2c83:9870:1940:33a:c441:14bd	Akron, OH
z	06-28-2019 03:36:13 UTC	2602:30a:2c83:9870:e47d:5a8b:49e2:b1f1	Akron, OH
aa	06-27-2019 01:52:04 UTC	2602:30a:2c83:9870:c8ba:c53f:f230:1140	Akron, OH
bb	06-21-2019 19:34:18 UTC	2602:30a:2c83:9870:4c12:87a6:3e5c:2a76	Akron, OH
cc	06-18-2019 16:53:00 UTC	2602:30a:2c83:9870:591f:a621:63dd:475	Akron, OH
dd	06-18-2019 16:52:59 UTC	2602:30a:2c83:9870:591f:a621:63dd:475	Akron, OH
ee	06-18-2019 16:52:57 UTC	2602:30a:2c83:9870:591f:a621:63dd:475	Akron, OH
ff	06-18-2019 16:52:56 UTC	2602:30a:2c83:9870:591f:a621:63dd:475	Akron, OH

	Date and Time of Access	IP Address that Accessed the <i>jamesbing2019</i> Google account	IP Address Location
gg	06-18-2019 16:52:55 UTC	2602:30a:2c83:9870:591f:a621:63dd:475	Akron, OH
hh	06-18-2019 16:19:52 UTC	2602:30a:2c83:9870:591f:a621:63dd:475	Akron, OH
ii	06-18-2019 16:06:27 UTC	2602:30a:2c83:9870:e989:a37:84c5	Akron, OH
jj	06-17-2019 09:49:31 UTC	2602:30a:2c83:9870:d885:6288:65e7:82b1	Akron, OH
kk	06-11-2019 02:10:56 UTC	2602:30a:2c83:9870:dd8a:37b0:34cd:4462	Akron, OH
ll	06-09-2019 14:55:24 UTC	2602:30a:2c83:9870:552f:81de:f9b3:fed6	Akron, OH
mm	05-27-2019 07:35:32 UTC	2602:30a:2c83:9870:68a8:b94c:3c70:ef50	Akron, OH
nn	05-27-2019 07:34:38 UTC	2602:30a:2c83:9870:68a8:b94c:3c70:ef50	Akron, OH
oo	05-25-2019 16:29:17 UTC	162.200.57.135	Akron, OH

All in violation of Title 18, United States Code, Section 1349.

COUNT 2

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances,
21 U.S.C. § 846)

The Grand Jury further charges:

29. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

30. From in or around March 2019 to in or around December 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants MICHAEL TIMOTHY WHITE, DURELL RICHERSON, DALLAS DELATTE, and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of hydrocodone, a Schedule II controlled substance, and a

mixture and substance containing a detectable amount of codeine, a Schedule V controlled, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C), and (b)(3).

All in violation of Title 21, United States Code, Section 846.

COUNT 3

(Aggravated Identity Theft, 18 U.S.C. §§ 1028A(a)(1) and 2)

31. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

32. On or about March 19, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DALLAS DELATTE, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of J.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DALLAS DELATTE, without authorization, used J.P.’s NPI number to possess a forged prescription for promethazine, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 4

(Aggravated Identity Theft, 18 U.S.C. §§ 1028A(a)(1) and 2)

33. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

34. On or about July 2, 2019, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DALLAS DELATTE, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of D.O., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the

means of identification belonged to another person, to wit: DALLAS DELATTE, without authorization, used D.O.'s DEA number and NPI number to possess a forged prescription for promethazine-codeine, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 5

(Aggravated Identity Theft, 18 U.S.C. §§ 1028A(a)(1) and 2)

35. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

36. On or about January 29, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of D.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used D.P.'s DEA number and NPI number to possess a forged prescription for hydrocodone polistirex and chlorpheniramine polistirex, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 6

(Aggravated Identity Theft, 18 U.S.C. §§ 1028A(a)(1) and 2)

37. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

38. On or about January 29, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of D.P., a

healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used D.P.'s DEA number and NPI number to possess a forged prescription for promethazine-codeine, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 7

(Aggravated Identity Theft, 18 U.S.C. 1028A(a)(1) and 2)

39. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

40. On or about February 7, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of C.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used C.P.'s DEA number to possess a forged prescription for promethazine-codeine, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 8

(Aggravated Identity Theft, 18 U.S.C. 1028A(a)(1) and 2)

41. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

42. On or about February 10, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of

C.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used C.P.'s DEA number and NPI number to possess a forged prescription for promethazine-codeine, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 9

(Aggravated Identity Theft, 18 U.S.C. 1028A(a)(1) and 2)

43. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

44. On or about February 10, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of C.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used C.P.'s DEA number and NPI number to possess a forged prescription for promethazine-codeine, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 10

(Aggravated Identity Theft, 18 U.S.C. 1028A(a)(1) and 2)

45. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

46. On or about February 10, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DALLAS DELATTE, during and in relation to felony

violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of D.I., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DALLAS DELATTE, without authorization, used D.I.'s NPI number to possess a forged prescription for promethazine, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 11

(Aggravated Identity Theft, 18 U.S.C. 1028A(a)(1) and 2)

47. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

48. On or about February 11, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of C.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used C.P.'s DEA number to possess a forged prescription for hydrocodone polistirex and chlorpheniramine polistirex, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 12

(Aggravated Identity Theft, 18 U.S.C. 1028A(a)(1) and 2)

49. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

50. On or about February 12, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of C.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used C.P.'s NPI number to possess a forged prescription for metronidazole, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 13

(Aggravated Identity Theft, 18 U.S.C. 1028A(a)(1) and 2)

51. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

52. On or about February 12, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of C.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used C.P.'s NPI number to possess a forged prescription for promethazine-codeine, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 14

(Aggravated Identity Theft, 18 U.S.C. 1028A(a)(1) and 2)

53. The factual allegations of Paragraphs 1–4, and 7–28 of this Indictment are hereby repeated, re-alleged, and incorporated by reference as if fully set forth herein.

54. On or about February 14, 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendant DURELL RICHERSON, during and in relation to felony violations of Title 18, United States Code, Section 1349 (Conspiracy to Commit Wire Fraud), knowingly transferred, possessed, and used without lawful authority a means of identification of D.P., a healthcare provider and real person whose identity is known to the Grand Jury, knowing that the means of identification belonged to another person, to wit: DURELL RICHERSON, without authorization, used D.P.'s DEA number and NPI number to possess a forged prescription for hydrocodone polistirex and chlorpheniramine polistirex, in violation of Title 18, United States Code, Sections 1028A(a)(1) and 2.

COUNT 15

(Conspiracy to Distribute and Possess with Intent to Distribute Controlled Substances,
21 U.S.C. § 846)

55. From in or around October 2019 to in or around December 2020, in the Northern District of Ohio, Eastern Division, and elsewhere, Defendants MICHAEL TIMOTHY WHITE, AMANDA BALL, and others known and unknown to the Grand Jury, did unlawfully, knowingly, and intentionally combine, conspire, confederate, and agree with each other to distribute and possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, a mixture and substance containing a detectable amount of oxycodone, a Schedule II controlled substance, and a mixture and substance containing a detectable amount of MDMA, a Schedule I controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1), (b)(1)(C).

Manner and Means

56. It was part of the conspiracy that:

A. MICHAEL TIMOTHY WHITE ordered kilogram-quantities of firmapress, a pill binding agent utilized in the manufacturing of tablets. WHITE had the firmapress orders shipped to his residence at XXXX Bedford Ave SW, Canton, Ohio.

B. MICHAEL TIMOTHY WHITE and others maintained a residence at XXX Johnston Street, Akron, Ohio for purposes of manufacturing, mixing, and selling various controlled substances, including illicit pills.

C. MICHAEL TIMOTHY WHITE and others possessed a pill press machine for purposes of manufacturing illicit pills.

D. MICHAEL TIMOTHY WHITE distributed controlled substances to AMANDA BALL and others, who then distributed the controlled substances to customers in the Akron, Ohio area.

Acts in Furtherance of the Conspiracy

57. In furtherance of the conspiracy, and to effect the objects thereof, MICHAEL TIMOTHY WHITE, AMANDA BALL, and others committed the acts described in the following paragraphs, in the Northern District of Ohio and elsewhere.

58. Between approximately January 17, 2020 and January 22, 2020, MICHAEL TIMOTHY WHITE had a text message conversation with N.C., a person known to the Grand Jury. N.C. texted, “Nd sum 4 samples knw sum ppl askn,” meaning that N.C. was asking WHITE for a quantity of drugs. WHITE texted, “Cuzzo got a hard a Glock 22 40cal . . . For sale my fault,” meaning that WHITE had a Glock firearm for sale. N.C. texted, “Nd joints ppl kp askin.”

59. On or about February 1, 2020, MICHAEL TIMOTHY WHITE sent a text message to N.C. stating, “Got \$600 need 4 of em.”

60. On or about February 23, 2020, MICHAEL TIMOTHY WHITE sent a text message to N.C. stating, "Call me cuzzo tryna shoot u this sample pack," meaning that WHITE was offering N.C. a sample of drugs for sale.

61. On or about March 23, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL said, "quick play down the rd can i grab 2 real quick," meaning that BALL was asking WHITE for drugs to sell to her customer. WHITE replied, "Here in basement . . . Got two."

62. On or about March 24, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL said, "everyone sayin them thangs the truth daddy . . . one my wops [drug customer's] jars was 7 off if u got sum i told them id make it rite." WHITE replied, "Ok we can sorry just waking up."

63. On or about March 29, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL asked, "You got moly" (MDMA). WHITE replied, "Nope been just fucking with the beans" [meaning a type of illicit pills]. BALL said, "Bout to catch some wops tho." WHITE said, "You good baby did how it go with those tens [10mg oxycodone pills]." BALL said, "Got em still but I'm tryna off um . . . I need 13 more yellows they all for one play . . . Can I come thru they otw . . . Drop yo money n I need them for the ppl comin now."

64. On or about April 1, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL said, "These is yours? Lol" and attached a picture of what appeared to be a pair of hands holding two white-colored pills labeled as oxycodone 10mg tablets. BALL then said, "I gotta catch 2 on the west ima have to take csiden w me." WHITE said, "Did you already send that cash app," to which BALL replied, "Naw that

was for the yellow tens.” WHITE said, “So you sent that cash app for yellows.” BALL replied, “Yea . . . Is that pic ur tens.” WHITE said, “No.”

65. On or about April 2, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL said, “Bring sum beans [pills] with u I’ll sell um while u here.” WHITE replied, “Ok . . . You can come get whole one.” BALL said, “Ok boo I’ll be there in 5.”

66. On or about April 7, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL said, “Ooooo yo beans is . . . shakin . . . Phone shaken not me I ont pop them no more.” WHITE said, “On my way! To ur house.” BALL said, “I got crazy wops [drug customers] to catch.” Later in the conversation, BALL said, “Ima catch this one then come to ur house.” WHITE replied, “Ok and hey I got like 150 white bars I paid 4.50 cause someone owed me and I let them payme in them ☺ can we do anything with them their legit tho[?]” BALL replied, “Yes lol.” WHITE said, “All I want is my damn money out these things can u make a profit and get me 4.50[?]” Later in the conversation, WHITE said, “Got 75 left for u my bro just took the rest.” BALL replied, “Here.”

67. Between approximately April 8, 2020 and April 9, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL said, “Ima need more them zans [Xanax] lol they al bout to be gone.” WHITE replied, “Ok bout to come ur way.” BALL asked, “U got RrpS n u [meaning did WHITE have oxycodone tablets]?” WHITE replied, “Yes I do.” Later in the conversation, WHITE asked, “You ready to get zans[?]” BALL replied, “My bad baby sorry call me wen u done yea I need 100.” WHITE said, “It’s only a 50 left and I still got 50 for u to moveyou can get the other.”

68. On or about April 15, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL said, "I need 20 yellow . . . 10 white 10 yellow if u got both [meaning a quantity of pills]." WHITE replied, "Yes come over." BALL said, "My ppl pay high for them pharaohs if u ever get a chance on making them again." Later in the conversation, BALL asked, "U want 3 grams of vez for 80? All chunk." WHITE replied, "I'm not a whop my baby I buy pounds [meaning WHITE deals in bulk drug quantities]."

69. On or about April 17, 2020, MICHAEL TIMOTHY WHITE and AMANDA BALL had a text message conversation. BALL said, "you ain't hide any percs [oxycodone] here I got a big wop." WHITE replied, "No but I can bring u them . . . Only yellow left . . . I can try to see if it's some white around." BALL said, "nvm they left."

70. Between December 1, 2020 and December 4, 2020, MICHAEL TIMOTHY WHITE had a text message conversation with UM6725. WHITE texted, "10s in [meaning 10mg oxycodone pills]" and attached a picture. UM 6725 said, "Cuzzo tap in on the 30." WHITE said, "This my Lil bro he came from tha Chi With em and how much u gone charge her so I know." UM6725 replied, "25 u said 15 right [meaning the price for the 10mg oxycodone pills]." WHITE said, "Yup" and sent a picture. UM6725 said, "Send a single pic of one." WHITE then sent a picture. UM6725 then said, "I got a ball of molly [MDMA]."

71. On or about December 1, 2020, MICHAEL TIMOTHY WHITE had a text message conversation with UM3953. WHITE said, "Saying 10s [10mg oxycodone pills] is weak and taste chalky because there's no Tylenol . . . Just got too the lab slide through for them." UM3953 replied, "Ok."

72. On or about December 15, 2020, MICHAEL TIMOTHY WHITE possessed approximately 59 tablets that contained methamphetamine, at XXXX Bedford Ave SW, Canton, Ohio.

73. On or about December 15, 2020, MICHAEL TIMOTHY WHITE possessed 30 tablets containing methamphetamine, two digital scales, an empty cardboard box addressed to “Tim White” dated June 19, 2020 from LFA Machines [a company that sells firmapress and pill presses], and a blender with cocaine residue at XXX Johnston Street, Akron, Ohio.

74. On or about the following dates, MICHAEL TIMOTHY WHITE caused the following orders to be placed for kilogram-quantities of firmapress:

Date	Order Description	Email Address
10/30/2019	Firmapress White 1 kg	<i>doitall1220@gmail.com</i>
11/09/2019	Firmapress White 2 kg	<i>doitall1220@gmail.com</i>
12/22/2019	Firmapress Yellow 1 kg	<i>doitall1220@gmail.com</i>
12/22/2019	Firmapress White 1 kg	<i>doitall1220@gmail.com</i>
01/23/2020	Firmapress Yellow 1 kg	<i>sagp2017inc@yahoo.com</i>
01/23/2020	Firmapress Red 1 kg	<i>sagp2017inc@yahoo.com</i>
01/23/2020	Firmapress Blue 1 kg	<i>sagp2017inc@yahoo.com</i>
01/23/2020	Firmapress White 1 kg	<i>sagp2017inc@yahoo.com</i>
01/23/2020	Firmapress Blue 2 kg	<i>sagp2017inc@yahoo.com</i>
02/25/2020	Firmapress White 1 kg	<i>sagp2017inc@yahoo.com</i>
02/25/2020	Firmapress White 2 kg	<i>sagp2017inc@yahoo.com</i>
02/25/2020	Firmapress Blue 1 kg	<i>sagp2017inc@yahoo.com</i>
02/25/2020	Firmapress Yellow 1 kg	<i>sagp2017inc@yahoo.com</i>

03/25/2020	Firmapress Yellow kg	<i>sagp2017inc@yahoo.com</i>
03/25/2020	Firmapress White 1 kg	<i>sagp2017inc@yahoo.com</i>
03/25/2020	Firmapress White 2 kg	<i>sagp2017inc@yahoo.com</i>
04/30/2020	Firmapress White 5 kg	<i>sagp2017inc@yahoo.com</i>
04/30/2020	Firmapress Yellow 1 kg	<i>sagp2017inc@yahoo.com</i>
04/30/2020	Firmapress Pink 1 kg	<i>sagp2017inc@yahoo.com</i>
04/30/2020	Firmapress Yellow 2 kg	<i>sagp2017inc@yahoo.com</i>
05/23/2020	Firmapress White 5 kg	<i>sagp2017inc@yahoo.com</i>
06/19/2020	Firmapress White 5 kg	<i>sagp2017inc@yahoo.com</i>
08/06/2020	Firmapress White 5 kg	<i>sagp2017inc@yahoo.com</i>

COUNT 16

(Possession with Intent to Distribute Methamphetamine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

75. On or about December 15, 2020, in the Northern District of Ohio, Eastern Division, Defendant MICHAEL TIMOTHY WHITE did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

COUNT 17

(Possession with Intent to Distribute Methamphetamine, 21 U.S.C. §§ 841(a)(1) and (b)(1)(C))

The Grand Jury further charges:

76. On or about December 15, 2020, in the Northern District of Ohio, Eastern Division, Defendant MICHAEL TIMOTHY WHITE did knowingly and intentionally possess with intent to distribute a mixture and substance containing a detectable amount of

methamphetamine, a Schedule II controlled substance, in violation of Title 21, United States Code, Sections 841(a)(1) and (b)(1)(C).

FORFEITURE

77. For the purpose of alleging forfeiture pursuant to Title 21, United States Code, Section 853; Title 18, United States Code, Section 981(a)(1)(C); and Title 28 United States Code, Section 2461(c), the allegations of Counts 1, 2, 15, 16, and 17 are incorporated herein by reference. As a result of the foregoing offenses, defendants MICHAEL TIMOTHY WHITE, DURELL RICHERSON, DALLAS DELATTE, and AMANDA BALL, shall forfeit to the United States any and all property constituting, or derived from, any proceeds they obtained, directly or indirectly, as the result of the violations charged herein in Counts 2, 15, 16, and 17; and any and all of their property used or intended to be used, in any manner or part, to commit or to facilitate the commission of the violations charged herein in Counts 2, 15, 16, and 17; and/or any property real or personal, which constitutes or is derived from proceeds traceable to the violations charged herein in Count 1.

A TRUE BILL

Original document - Signatures on file with the Clerk of Courts, pursuant to the E-Government Act of 2002.